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ROY ROMER
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Interim Executive Director

March 9, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: Final Phase I RFI/RI Workplan for OU 9, Original Process Waste
Lines, February, 1992

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document submitted by DOE and prime operating contractor, EG&G. The Division appreciates the submittal of a much improved workplan. Most of our concerns were satisfactorily addressed. However, the Division gave the previous version of this workplan approval in a letter dated January 6, 1992, subject to six specific conditions. Although progress has been made on all of the items, we believe that two of these conditions remain unsatisfied.

The first item that needs additional attention is the question of equipment accessibility. The Division asked that a thorough assessment be made of the OU 9 area with respect to the implementation of the FSP as currently planned. The response to this request in the document was the addition of Appendix E and a statement in the text that this assessment will be undertaken during additional data compilation (Section 2.3.4). The Division and EPA must approve an FSP based on its ability to meet characterization objectives. However, in this case we are being asked to approve a plan where the implementation feasibility remains unclear. The Division suggests that the text identify presently known areas where an alternate or modified FSP will be necessary and add a section to the document that clearly outlines how implementation decisions will be made when additional areas are identified which limit access.

Another condition that was not adequately addressed was the review

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of hydraulic conductivities in the vicinity of the OPWL. Although Section 1.3.3.8 was expanded, the added text only reiterated the range of possible hydraulic conductivities in the Rocky Flats Alluvium. The Division would like to see a map showing the locations of wells where hydraulic conductivities have been determined, the values calculated, and their position relative to the OPWL network. We realize that data is limited, but the FSP depends on this data and the interpretation thereof. We do not, as yet, feel confident that the existing data has been completely considered.

The Division will require that these items be given additional attention as part of our approval of the OU 9 Phase I RFI/RI Workplan. As stated in DOE's cover letter to this submittal (92-DOE-1985), we will expect a response to these concerns on March 27, 1992, and would welcome a staff level meeting any time after March 16, 1992.

We would like to mention two additional items for consideration during any further modification of the workplan. First, workplan section 7.2.5 should be written to include the High Purity Germanium (HPGe) surficial radiation survey. This survey is being proposed in other areas of the plant and seems to be the best available technology for RFI/RI purposes. Second, on-going staff level discussions regarding proper sampling methodologies for surficial soil samples will require modification of sections 7.3.1.1, 7.3.1.2, and 7.3.2.1. This OU 9 investigation will need to collect surficial soil samples for both radionuclide and non-radionuclide analyses. A recent submittal from RFP (TM 5 for OU 1) includes a soil sampling methodology for both the rad and non-rad constituents and incorporates a risk-based approach to sampling frequency. The Division strongly suggests that this method be included in the OU 9 Workplan on an closure-unit specific basis (ie. for each OPWL tank, at a minimum).

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,



Gary W. Baughman

Unit Leader, Hazardous Facilities Unit

Hazardous Materials and Waste Management Division

cc: Martin Hestmark, EPA
Bruce Thatcher, DOE
Randy Ogg, EG&G
Paul Bunge, EG&G
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